

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

THE ESTATE OF JAMES FRANKLIN PERRY,
by BETTIE A. RODGERS, Special Administrator, and
JAMES FRANKLIN PERRY JR. (A Minor)
Plaintiffs,

Case No. 12-CV-664

v.
CHERYL WENZEL, R.N., et al.
Defendants.

**DECLARATION OF CHRISTOPHER P. KATERS OPPOSING
DEFENDANTS' CIVIL L.R. 7(h) EXPEDITED NON-DISPOSITIVE
MOTION FOR PROTECTIVE ORDER (Doc. 32)**

CHRISTOPHER P. KATERS declares, pursuant to 28 U.S.C. § 1746 under penalty of perjury that the following is true and correct.

1. I am attorney licensed to practice and in good standing with the State Bar of Wisconsin, I make this declaration based upon my own personal knowledge. My law firm has been retained to represent the plaintiffs in the above captioned matter.

2. Attached, hereto as Group **Exhibit A**, is a true and correct copy of correspondence between counsel for the parties attempting to schedule deposition after the Amended Complaint was filed on March 15, 2013.

3. Attached, hereto as **Exhibit B**, is a true and correct copy of a letter from plaintiff's counsel, Christopher P. Katers, to counsel for the County Defendants, Andrew Jones, enclosing notice for the depositions of Tina Watts dated March 12, 2013.

4. Attached, hereto as **Exhibit C**, is a true and correct copy of a letter from counsel for Defendant Sherriff David Clark, Andrew Jones, stating that Defendant Clark will not appear for a noticed deposition while a motion for protective order is pending dated April 11, 2013.

5. Attached, hereto as **Exhibit D**, is a true and correct copy of a letter from counsel for the County Defendants, Andrew Jones, stating that Defendants Cheryl Wenzel and Tina Watts will

not appear for a noticed deposition while a motion for protective order is pending dated April 19, 2013.

Dated this April 23rd, 2013

/s/Christopher P. Katers
Christopher P. Katers